

REMARKS

Reconsideration and withdrawal of the rejections of the claims set forth in the Official Action of June 2, 2005 are respectfully requested in view of the following remarks.

Status of the Claims

Claims 1-22 are currently pending.

Claims 1, 8, and 16 have been amended.

Rejections Under 35 U.S.C. § 112

Claims 1-22 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant respectfully traverses these rejections.

The Examiner alleges that one skilled in the art would not understand what is meant by the terms “focus elements,” “phrase intersection,” “phrase intersection table,” and “temporal processing.” Applicant respectfully disagrees because the meaning of each of the above-mentioned terms is clearly set forth in the specification. “Focus elements” are entities which are relevant to the focus of the articles. (See Specification, p. 4, lines 26-28). “Phrase intersection” determines whether two nodes have commonality. (See Specification, p. 6, lines 2-4). If commonality is found between two nodes, then the phrase is added to the “phrase intersection table.” (See Specification, p. 6, lines 2-4). “Temporal processing” involves time stamping phrases based on their first occurrence. (See Specification, p. 3, lines 8-10).

The Examiner alleges that the term “paraphrasing rules” is unclear as what the term refers to. Applicant respectfully disagrees. “Paraphrasing rules” detect similarities in non-identical phrases in the document. (See Specification, p. 2, lines 18-19). Although

“paraphrasing rules” is introduced in claim 2, claim 4 imposes further limitations on the terms by claiming specific rule embodiments.

The Examiner alleges that the terms “ambiguous temporal references,” “temporal marker,” and “temporal gap” are unclear. Applicant respectfully disagrees because the meaning of each of the above-mentioned terms is clearly set forth in the specification. “Ambiguous temporal references” are non-calendar date specific references, such as for example, today or yesterday. (See Specification, p. 8, lines 4-5). “Temporal gap” is a time gap that exists between consecutive phrases, and if the temporal gap exceeds a predetermined threshold, then a “temporal marker” is inserted between the phrases to indicate the gap in time. (See Specification, p. 8, lines 10-13).

The Examiner alleges that the term “phrase divergence processing” is unclear. Applicant respectfully disagrees because the meaning of this term is clearly set forth in the specification. “Phrase divergence processing” compares selected phrases for differences. (See Specification, p. 7, lines 19-20).

The Examiner alleges that the use of “generating a summary of a plurality of related documents,” which is recited in the preamble of claims 1, 8 and 16, is not provided for in the body of the claims. Applicant respectfully disagrees. However, in order to advance the prosecution of these claims, and without surrendering subject matter or equivalents thereof, claims 1, 8 and 16 have been amended to more particularly point out that a summary is generated as a result of the claimed method steps.

Accordingly, Applicants respectfully request withdrawal of the rejection to claims 1-22 under 35 U.S.C. § 112.

Rejections Under 35 U.S.C. § 101

Claims 1-7 have been rejected under 35 U.S.C. § 101 as allegedly directed to non-statutory subject matter, specifically, an abstract idea. Applicant respectfully disagrees, however in order to advance the prosecution of these claims, and without surrendering subject matter or equivalents thereof, claim 1 has been amended to more clearly tie the method to the technological arts by including a plurality of documents available in computer readable media. Claims 2-7, which depend from claim 1, should be patentable for at least those reasons set forth above.

Accordingly, the withdrawal of the rejections to claims 1-7 under 35 U.S.C. § 101 is respectfully requested.

Rejections Under 35 U.S.C. § 103

Claims 1-22 have been rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 6,205,456 to Nakao ("Nakao") and U.S. Patent No. 6,098,034 to Razin ("Razin"). Applicant respectfully traverses these rejections.

Claim 1 of the present invention requires, *inter alia*, performing temporal processing on phrases. Temporal processing, as claimed in the present invention, includes time stamping phrases based on a first occurrence of the phrase in the collection, and substituting date certain references for ambiguous temporal references. Temporal processing is needed to sort phrases extracted from a collection, or a plurality, of documents in order to produce a coherent summary.

No such arrangement is disclosed in or suggest by Razin, either alone or in combination with Nakao. Razin discloses determining whether a candidate phrase is proximate to a standard phrase (Razin, col. 3, lines 24-30), determining a meaning of a sequence of words

(Razin, col. 3, lines 46-58), and then treats sequence of words as standard phrases (Razin, col. 4, lines 4-17). Although these cited passages disclose treating sequences of words, Razin does not does not teach or suggest temporal processing because Razin only deals with a single document. (Razin, col. 1, lines 5-6). Therefore, because Razin deals with only a single date certain reference - *a document* - there is no need or motivation for Razin to perform temporal processing, which is used to time sort phrases and remove ambiguous time references from a plurality of documents.

Nakao Fails to cure the deficiencies of Razin because Nakao, as does Razin, only deals with the summarization of a single document. (Nakao, col. 5, lines 64-66).

Further, because both Razin and Nakao summarize only a single document (See Nakao, col. 5, lines 64-66; Razin, col. 1, lines 5-6), they fail to disclose extracting phrases having focus elements from the plurality of documents, as recited in claim 1 of the present invention. Because Razin and Nakao, either alone or in combination, fail to disclose or suggest each and every element of claim 1 of the present invention, these references do not render the present invention obvious.

Independent claims 8 and 16 are system and media claims substantially corresponding to the method recited in claim 1, and should be patentable at least for the reasons set forth above. In view of the absence of any disclosure regarding the noted claim elements or the invention as a whole, Applicants respectfully submit that the independent claims 1, 8, 16 each define patentable subject matter over the art of record. Claims 2-4, 6-7, 9-11, 13-15, 17-19, and 21-22 depend from these claims are patentable at least for the reasons set forth above.

Accordingly, Applicant respectfully requests that the rejections under 35 USC § 103 be withdrawn.

Respectfully submitted,



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